

Application No. 09/328,607 (Conf. No. 7017)
Reply to final Office Action dated August 19, 2005

Docket No. Acharya 3-6-8

REMARKS

I. Status of the Claims

Claims 1, 3-24 and 28-35 are pending in the application.

II. Summary of the Office Action and this Reply

The Examiner has rejected claims 1, 3-24 and 28-35 under 35 U.S.C. § 103(a), asserting that such claims are unpatentable over Japanese Patent Document No. 10-111873 ("Hida") in view of Japanese Patent Document No. 07/282079 ("Mizuno").

The Examiner is thanked for the telephone interview conducted on September 22, 2005, for which an Applicant Initiated Interview Request Form was filed.

In this Reply, claims 1, 17, 21, 28, 30, and 33 are amended. No new matter is added. It is noted that the amendments and arguments in this Reply, though presented after final rejection, are presented to put the claims in condition for allowance and/or in better condition for appeal. Thus, it is respectfully requested that the amendments herein be entered.

III. Discussion of the Cited Art

Japanese Patent Document No. 10-111873 (Hida)

Hida acknowledges that, in the prior art, it is possible to establish only one fixed link destination (electronic address) in an HTML file from a single hyperlink, the textual/graphical hyperlink being referred to in Hida as the "link object." See paragraphs 3, 5.

Application No. 09/328,607 (Conf. No. 7017) **Docket No. Acharya 3-6-8**
Reply to final Office Action dated August 19, 2005

Hida discloses a link destination control system for an HTML file browser that seeks to automatically select the link destination, corresponding to conditions which, in turn, correspond to several link destinations in a link object for an HTML file browser. See Abstract. Accordingly, Hida describes the relationship between one link in the HTML file, and several corresponding link destinations (addresses).

However, the several corresponding link destinations/addresses correspond to only a single file. This is readily apparent from Figures 2 and 3 of the original Japanese language Hida document. Thus, Hida discloses that there is only the conventional one-to-one relationship between a hyperlink and a linked file; only a single file (joho2.htm in the example of Figures 2 and 3) may be retrieved upon selection of a single hyperlink.

Japanese Patent Document No. 07/282079 (Mizuno)

Mizuno discloses presenting a list display as a pop-up menu in the vicinity of a node by reading information from a node table and a link table.

IV. Response to 103 Rejections

In paragraph 5 of the Action, the Examiner rejected claims 1, 3-24 and 28-35 under 35 U.S.C § 103(a).

Claim 1

In contrast to Hida, independent claim 1 is directed to a method of operation of a client computer by which there is a one-to-many relationship between a hyperlink and linked files that may be retrieved via that hyperlink; multiple different files may be retrieved upon selection of a single hyperlink (referred to in the

**Application No. 09/328,607 (Conf. No. 7017) Docket No. Acharya 3-6-8
Reply to final Office Action dated August 19, 2005**

specification as a "multilink" in emphasis of its ability to provide a logical point of access to multiple files).

That a single hyperlink in accordance with the present invention provides a point of access to multiple different files is evident in claim 1, which recites "displaying, at the client computer, a multilink as a hyperlink, the multilink providing a logical point of access to a plurality of distinct files." See also page 6, lines 11-13. Webster's Ninth New Collegiate Dictionary (1984) defines "distinct" as "distinguishable to the eye or mind; discrete"; dictionary.com defines "distinct" as "readily distinguishable from all others; discrete."

The Examiner relies on Hida as teaching this element. While Figure 2 of the Japanese language version of Hida shows an HTML file including two unique electronic addresses corresponding to a single hyperlink (between the SOMELINK tags), those links are not links to a plurality of distinct files. In other words, the linked files associated with the corresponding hyperlink are not distinct. Instead they are both the same file, namely the "joho2.htm" file. The only differences in the alternative URLs for the single hyperlink are the destination addresses from which the identical file is to be retrieved. See Figure 2, which identifies the same file at different destination addresses. Accordingly, in Hida, there is only one linked object corresponding to a single hyperlink.

In contrast, claim 1 requires that the hyperlink is a point of access to a plurality of distinct files (e.g. file1.htm, file2.htm, file3.pdf). Accordingly, Hida teaches using a single link to retrieve a single file from one of several alternative destinations/storage locations, such that there is a one-to-one relationship between a hyperlink and a distinct file. In contrast, the claimed invention relates to using a single link to retrieve one of several distinct files, such that there is a one-to-many

Application No. 09/328,607 (Conf. No. 7017) Docket No. Acharya 3-6-8
Reply to final Office Action dated August 19, 2005

relationship between a hyperlink and distinct files. Accordingly, in contrast to Hida, the present invention provides that there are multiple different linked objects corresponding to a single hyperlink.

In clarification of the nature of the multiple distinct files accessible via a single hyperlink, claim 1 is amended herein to recite that the multilink provides a logical point of access to "a plurality of distinct files, each of the plurality of files differing from others of the plurality of distinct files."

It should be noted that this provides an entirely different result than Hida. According to Hida, a single hyperlink corresponds to a single file, although that file may be retrieved from alternative locations/destinations using alternative electronic addresses. However with Hida, for an exemplary single web page having 10 linked files, 10 hyperlinks will be presented on the page. If any one of those links is selected, the same file will be retrieved every time as a result of that selection. For example, selection of a link to a clown image will always result in display of the same clown image, regardless of which address is used to retrieve that clown image.

In contrast, the present invention provides that multiple different files may be retrieved in response to a selection of a single hyperlink. Accordingly, for example, a single web page may have 10 linked files that are accessible via a single multilink presented on the page. This simplifies and reduces clutter on a web page while allowing access to multiple different files, as illustrated by comparing Figures 2A and 2B of the application (Figure 2B also showing the pop up shown only after selection of the multilink, which is not visible before selection of the multilink). Further, selection of the single multilink may result in display of any one of the linked files, e.g. a clown image, a frog image, a grasshopper image, etc. depending upon the user's selection from the pop-up menu.

**Application No. 09/328,607 (Conf. No. 7017) Docket No. Acharya 3-6-8
Reply to final Office Action dated August 19, 2005**

Accordingly, not all claim elements are taught or suggested by Hida. Further, this deficiency is not cured by Mizuno. In Mizuno, the conventional one-to-one relationship between a hyperlink and a linked file is maintained; only a particular single file may be retrieved upon selection of a single hyperlink. Mizuno is discussed further below.

For at least this reason, reconsideration and withdrawal of the rejection of claim 1 are requested respectfully.

Further, claim 1 recites "generating a menu of options, at the client computer, in response to a user's selection of the multilink." The Examiner states that Hida does not teach generating a menu of options in response to the user's selection of the multilink. Applicants agree. However, the Examiner asserts that Mizuno provides such a teaching. Applicants respectfully traverse.

Mizuno discloses presenting a list display as a pop-up menu in the vicinity of a node by reading information from a node table and a link table. However, the pop up menu is displayed before the user's selection of the link. This is clearly stated in Mizuno at paragraph 57, in summary of the Effect of the Invention, as follows:

The user can know the relationship with the link's destination node, before manipulating the link, by displaying the table of link-node relationships as a menu item.

In sharp contrast, claim 1 recites that the menu of options is generated responsively, i.e. after a user's selection of the multilink. To modify Mizuno to arrive at the claimed invention would change the principle of operation of Mizuno and would destroy the intended, clearly stated effect of Mizuno's invention.

Accordingly, not all claim elements are taught or suggested by the cited art. For at least this additional reason, reconsideration and withdrawal of the rejection of claim 1 are requested respectfully.

Application No. 09/328,607 (Conf. No. 7017) **Docket No. Acharya 3-6-8**
Reply to final Office Action dated August 19, 2005

Claim 33

Independent claim 33 includes recitations similar to those of claim 1 and thus claim 33 is likewise patentable for reasons similar to those set forth above for claim

1. In emphasis of the distinct nature of the multiple files accessible via a multilink, claim 33 recites "displaying a multilink as a hyperlink of a web page, the multilink providing a single logical point of access to a plurality of distinct files, each of the plurality of distinct files being different from others of the plurality of distinct files in at least one of information content and format."

This is neither taught nor suggested by the prior art.

Claims 3-16

Claims 3-16 depend from claim 1 and are likewise patentable. In addition, claim 5 recites that the electronic addresses of the files are concatenated in a multilink URL, which is described in the application as distinct from a plurality of URLs. In contrast, Hida discloses only that a file may include multiple URLs. Neither Hida nor Mizuno teach or suggest a multilink URL. Accordingly, not all claim elements are taught or suggested by the cited art.

Claim 16 recites an embodiment in which a multilink is selectable to display a menu of selectable links, one of which is itself a multilink selectable to display a menu of selectable links. This is neither taught nor suggested by the cited art.

Claims 17-24 and 28-35

Independent claims 17, 21, 28, and 30 include recitations similar to those of claim 1. Claims 18-20, 22-24, 29, and 31-32 depend from these claims and are likewise patentable.

**Application No. 09/328,607 (Conf. No. 7017) Docket No. Acharya 3-6-8
Reply to final Office Action dated August 19, 2005**

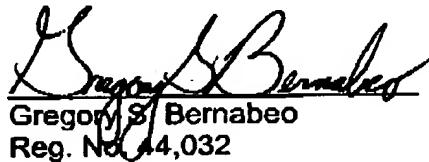
Claims 34 and 35 depend from claim 33 and are likewise patentable.

Accordingly, reconsideration and withdrawal of the rejections of claims 17-24 and 28-35 are requested respectfully.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants believe claims 1, 3-24 and 28-35 to be patentable and the application in condition for allowance. Applicants respectfully request issuance of a Notice of Allowance. If any issues remain, the undersigned requests a telephone interview prior to the issuance of an action.

Respectfully submitted,



Gregory S. Bernabeo
Gregory S. Bernabeo
Reg. No. 4,032

Synnestvedt & Lechner LLP
2600 Aramark Tower
1101 Market Street
Philadelphia, PA 19107
Telephone: (215) 923-4466
Facsimile: (215) 923-2189

Date: September 29, 2005